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Attorneys for Plaintiffs

National Collegiate Athletic Association,  
National Basketball Association, National  
Football League, National Hockey League, and  
Office of the Commissioner of Baseball doing  
business as Major League Baseball

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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NATIONAL COLLEGIATE ATHLETIC  
ASSOCIATION, *et al.*,

Plaintiffs,

v.

CHRISTOPHER J. CHRISTIE, Governor of the  
State of New Jersey, *et al.*,

Defendants.

: Civil Action No. 12-cv-4947 (MAS)(LHG)  
: Hon. Michael A. Shipp, U.S.D.J.  
: Hon. Lois H. Goodman, U.S.M.J.

**MOTION DAY: December 18, 2012**

**NOTICE OF PLAINTIFF'S CROSS-  
MOTION TO SEAL ADDITIONAL  
DOCUMENTS**

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To: Christopher S. Porrino  
Assistant Attorney General  
Director, Division of Law  
Office of the Attorney General  
Richard J. Hughes Justice Complex  
25 Market Street, P.O. Box 080  
Trenton, New Jersey 08625  
Counsel for Defendants

**PLEASE TAKE NOTICE** that on December 18, 2012 at 1:00 p.m., or as soon thereafter as counsel may be heard, the undersigned, counsel for Plaintiffs National Collegiate Athletic Association, National Basketball Association, National Football League, National Hockey League, and Office of the Commissioner of Baseball doing business as Major League Baseball, shall apply to the United States District Court, District of New Jersey at the United States Courthouse, 402 East State Street, Trenton, New Jersey 08608, for entry of an Order pursuant to Local Civil Rule 5.3(c)(2) sealing the following documents: (1) exhibits 1, 2, 3, 7, 9, 17, 20, 21, 23, and 31 to the December 6, 2012 Certification of Richard Hernandez; (2) an unredacted version of Plaintiffs' Reply Brief in Support of their Motion for Summary Judgment and, If Necessary to Preserve the Status Quo, a Preliminary Injunction, and Brief in Opposition to Defendants' Cross-Motion for Summary Judgment; (3) an unredacted version of Plaintiffs' Reply Statement of Undisputed Material Facts Pursuant to Local Rule 56.1; and (4) an unredacted version of Plaintiffs' Response to Defendants' Statement of Undisputed Material Facts Pursuant to Local Rule 56.1.

**PLEASE TAKE FURTHER NOTICE** that in support of the motion we shall rely upon Plaintiffs' Brief in Further Support of Defendants' Motion to Seal and in Support of Plaintiffs' Cross-Motion to Seal Additional Documents, the Certification of Naima M. Stevenson of the National Collegiate Athletic Association in Further Support of Defendants' Motion to Seal Documents and in Support of Plaintiffs' Cross-Motion to Seal, the Certification of Daniel J. Spillane of the National Basketball Association in Further Support of Defendants' Motion to Seal Documents and in Support of Plaintiffs' Cross-Motion to Seal, the Certification of Lawrence P. Ferazani, Jr. of the National Football League in Further Support of Defendants' Motion to Seal Documents and in Support of Plaintiffs' Cross-Motion to Seal, and the

Certification of Jessica C. Berman of the National Hockey League in Further Support of Defendants' Motion to Seal Documents and in Support of Plaintiffs' Cross-Motion to Seal, submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a Proposed Form of Order and Findings of Facts is submitted with this motion.

**McCARTER & ENGLISH, LLP**

Dated: December 7, 2012

By: s/William J. O'Shaughnessy

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